DOCUMENT RESUME

ED 324 383 UD 027 651

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TITLE	Food Stamp Quick Response Studies. Categorical Eligibility Descriptive Report. Final Draft.
INSTITUTION	Urban Inst., Washington, D.C.
SPONS AGENCY	Food and Nutrition Service (DOA), Washington, D.C.
PUB DATE	23 Jun 87
CONTRACT	FNS-53-3198-6-41
NOTE	67p.
AVAILABLE FROM	The Urban Institute, 2100 M Street NW, Washington, DC 20037.
PUB TYPE	Reports - Evaluative/Feasibility (142)
EDRS PRICE	MF01 Plus Postage. PC Not Available from EDRS.
DESCRIPTORS	*Eligibility; *Error Patterns; Federal Legislation; Federal Programs; Low Income Groups; *Participation; Poverty; *Program Administration; *Program Costs; Program Evaluation; Research Needs; Welfare Services
IDENTIFIERS	Aid to Families with Dependent Children; *Food Security Act 1985; *Food Stamp Program; Supplemental Security Income Program

ABSTRACT

This report reviews the impact of the categorical eligibility provision of the Food Security Act of 1985 (FSA) on the program participation, administrative costs, and error rates of the Food Stamp Program (FSP). The Act automatically granted eligibility for the FSP to households composed entirely of participants in the Aid to Families with Dependent Children (AFDC) and Supplemental Security Income (SSI) programs. The following primary conclusions are reported: (1) while total participation is very unlikely to be substantially increased, some specific types of households may gain eligibility; (2) there is some potential for impact on administrative costs, but further research is needed to determine the magnitude and direction of these effects; and (3) any reduction in error rates will be the indirect result of increases in the amount of caseworker time available for each case, rather than a direct result of the provisions themselves. Recommendations for further research are suggested. Six tables of statistical data are included. A 27-item bibliography is appended. (FMW)

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3/12/90

ED324383

FINAL DRAFT

TASK ORDER 2, Deliverable No. 1

Categorical Eligibility Descriptive Report

CONTRACT TITLE:	Food Stamp Quick Response Studies
AGENCY:	U.S.D.A. Food and Nutrition Service
CONTRACT NUMBER:	FNS-53-3198-6-41
SUBMITTED BY:	The Urban Institute 2100 M Street, N.W. Washington, D.C. 20037
CONTRACT AMOUNT:	Task Order 2: $242,454
DEPARTMENT PROJECT OFFICER:	Linda Esrov U.S. Department of Agriculture Food and Nutrition Service Office of Analysis and Evaluation 3101 Park Center Drive, Room 1024 Alexandria, Virginia 22302
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DATE SUBMITTED:	June 23, 1987

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I. INTRODUCTION

Under the Food Security Act of 1985, eligibility for the Food Stamp Program (FSP) was automatically granted to households composed entirely of participants in the Aid to Families with Dependent Children (AFDC) and Supplemental Security Income (SSI) programs. In general, these households are eligible for FSP benefits without regard to their eligibility (or lack of eligibility) under other provisions of the Food Stamp Act.[1] A desire to assess the administrative impacts of this provision, as well as concerns about possible increases in participation and in benefit costs, led the Congress to mandate a study of the effects of this categorical eligibility provision as part of its authorizing legislation.[2] This report, which provides information on what is currently known about the legislation's potential impacts on program participation, administrative costs, and error rates, is the first product of that study.

As noted above, the major rationale for providing categorical eligibility for food stamps to households consisting solely of AFDC and SSI recipients was to simplify program administration (which in turn might reduce the potential for errors.) In addition, any resulting reduction in paperwork might ease access to the program, even for households already eligible under current law. Moreover, it

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1. These households must comply with certain other FSP rules, such as the work registration requirement, and must meet certain other criteria applying to all FSP participants -- for example, benefits are not available to those who have voluntarily ceased employment after receiving FSP certification. All other income and asset tests are waived for these households, however.

2. See House Report (Agriculture Committee) No. 99-271(I), September 13, 1985 [To accompany H.R. 2100], p. 142 and Senate Report (Committee on Agriculture, Nutrition and Forestry) No. 99-145 [To accompany S. 1714], p.244.

was not anticipated that this provision would substantially expand total eligibility for the program. Indeed, the U.S. House of Representatives report on the Food Security Act, cited above, indicates that almost all current AFDC and SSI recipients are thought to meet the income and asset tests for the FSP as well. Therefore the provision of categorical eligibility for these households was not expected to loosen the eligibility requirements for the FSP significantly.

The current categorical eligibility provision is restricted to AFDC and SSI recipients living in households composed solely of such recipients — so called "pure" AFDC and SSI households. The rationale for this is to limit the expansion of FSP eligibility. Because asset and income tests for AFDC and SSI are similar to those in the FSP, it is likely that many AFDC or SSI participants are already eligible for the Food Stamp Program. [3] However, categorical eligibility for food stamps was not extended to all AFDC or SSI recipients because of differences in the way the eligible unit is defined under the three programs. For AFDC and SSI, eligibility may be determined with regard to families, sub-families, or, in SSI, even for individuals. FSP eligibility determinations, however, are based on an eligibility unit composed of all persons living in the same household and sharing meals and cooking facilities. As a result, some AFDC and SSI recipients may therefore live in larger households that would not meet FSP eligibility criteria. Because of this difference in the unit used as

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3. In fact, since 1981 States have had the option of extending resource eligibility for the FSP to all households making all such households eligible for the FSP without regard to their asset holdings. Therefore, the new rule affects only income standards in the 25 states that had implemented this change by 1985.

the basis for determining eligibility and benefits, categorical eligibility could not simply be extended to all AFDC and SSI households without potentially expanding the number of persons eligible for the Food Stamp Program.

While it appears unlikely that the current categorical eligibility provisions will greatly increase the pool of potential food stamp recipients, there is still some possibility that eligibility for the FSP will be broadened somewhat. This issue is clearly one of the major questions to be addressed in evaluating the impacts of categorical eligibility. Other important questions for evaluation relate to the effects of this legislative change on program administration and on error rates. The extent of administrative impacts will be determined largely by caseload size and characteristics and by the procedures eligibility workers use to handle applications from public assistance (PA) and non-public assistance (NPA) households.

Each of these issues is discussed in more detail in the following three chapters of this report. Before turning to those discussions, however, it may be helpful to outline briefly the history of the categorical eligibility provision in the Food Stamp Program.

Categorical Eligibility in the Food Stamp Program before 1985

Categorical eligibility for public assistance recipients in general was the prevailing rule in the Food Stamp Program in its beginning years. The Food Stamp Act of 1964 established a voluntary program that offered federal financial assistance to States choosing to administer food stamp projects. Each program was allowed to set

its own eligibility standards, as long as they were consistent with those the State used for other federally aided assistance programs. This requirement had the effect of making all public assistance recipients in project areas eligible to participate in the FSP demonstrations. Those who did not receive public assistance because they did not meet non-financial criteria (e.g., households which included an able-bodied male or did not include children, who were thus ineligible for AFDC or related public assistance programs in most States) still might qualify for food stamps if their income and assets were sufficiently low.

The 1970 (1971) Amendments to the Food Stamp Act (Public Law 91-671)[4] substantially revised eligibility and changed the nature of the program itself. The scattered projects whose scope and administration had been determined at the local level were transformed into a near-national program with uniform eligibility standards. Variances were still allowed for non-continental areas with higher costs of living and for public assistance recipients. A dual eligibility system was established, whereby households composed entirely of public assistance recipients (those receiving benefits from AFDC or State General Assistance programs) were automatically, or categorically, eligible to participate in the Food Stamp Program. These households were generally referred to as PA households. Mixed or non-public assistance (NPA) households, on the other hand, had to meet a federally mandated standard to be deemed eligible for the FSP. SSI recipients, when that program consolidated the federal Old Age

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4. The bill was passed by both Houses of Congress in December, 1970, and President Nixon signed it in January, 1971; thus the dual designation.

Assistance, Aid to the Blind, Aid to the Permanently and Totally Disabled, and Aid to the Aged, Blind or Disabled programs in 1977, were counted as PA recipients if they resided in an otherwise pure PA household. They were classified as members of NPA households if they lived alone or with other SSI beneficiaries. However, in such a case gross income and asset standards were not applied to them.

In 1973, States' full participation in the Food Stamp Program was made mandatory, under P.L. 93-86. If a State chose to administer a program, it was required to offer it throughout the State. (Currently, all States have chosen to participate.) The program as it existed at that time was still somewhat different from the current program, however. The dual eligibility standard for PA and NPA households was left intact, and the food coupons issued to households in need were subject to a purchase requirement -- households had to pay a portion of the coupons' face value in order to obtain them.

The Food Stamp Act of 1977 brought the FSP to its current form. It eliminated both the purchase requirement and the dual eligibility system, under which some States had been able to set their own eligibility standards, at least for PA households. Citing concerns about the equity of favoring households which happened to receive public assistance, as well as administrative concerns, Congress substituted a single national eligibility standard, to be fully implemented by January of 1979.[5]

This change in the law did cause some AFDC families to lose their eligibility for the FSP. These families lived in high benefit States

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5. House Report (Agriculture Committee) No. 95-464 [To accompany H.R. 7940], p. 94.

and presumably had incomes slightly above the maximums allowed for FSP eligibility, since even in high benefit areas the maximum income level at which AFDC recipients could still qualify for benefits was typically close to the FSP eligibility threshold. Estimates of the number dropped from the FSP rolls because of the new rules were about 600,000 persons.[6]

Given this history, it is understandable that restoration of a form of categorical eligibility has raised concerns about possible impacts on program participation, whose costs could conceivably outweigh any savings from improved administrative efficiency. The object of this report is to assess what is known about categorical eligibility's likely effect on participation in the program, and on caseworkers' accuracy in determining eligibility and benefits. To that end, relevant information will be garnered from other FNS-sponsored projects, such as the Simplified Application Demonstration and the Program Operations Survey, as well as from other sources such as program handbooks and data bases containing information on the characteristics of program recipients.

The next three chapters focus specifically on the effects of categorical eligibility on three main areas of concern: program participation, administration, and error rates.

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6. Report of the President's Task Force on Food Assistance, 1984, p. 144.

II. PARTICIPATION EFFECTS

Although, as discussed in the last chapter, major participation effects were not expected to result from categorical eligibility at the time of its passage, some concerns about its potential impacts on participation levels and benefit costs were expressed. In particular, the relatively large number of persons eliminated from the Food Stamp Program rolls when the earlier version of categorical eligibility for PA households was eliminated in 1979 caused some observers to fear that restoration of this type of provision could cause an analogous increase in program rolls. Differences between the current provision and the earlier one, and changes in the characteristics of the PA caseload since 1979, make such an expansion in program rolls unlikely, however.

This chapter first offers a detailed comparison of the old and new versions of the categorical eligibility provision, which explains why the effect of the new law might be expected to differ in some important respects from that of the earlier version of categorical eligibility. The chapter then goes on to examine the current characteristics of the AFDC program and caseload, and compares them with those of the FSP. The goal of this section is to identify differences in AFDC and FSP parameters that might lead some current AFDC recipients to be ineligible for the FSP in the absence of categorical eligibility, but to be eligible under the new provisions. The third section of the chapter undertakes a similar examination of SSI parameters, while the final section summarizes these findings and discusses their possible implications for the numbers and types of new participants that might be added to the FSP under categorical eligibility.

Categorical Eligibility Under Current Law as Compared to Pre-1977 Law

When the Food Stamp Act of 1964 was enacted, it was decided without debate to allow States to set their own eligibility standards, should they decide to participate in the new program. Eligibility provisions were subject only to the condition that the income eligibility standards should be similar to those used for State-administered AFDC or General Assistance programs. In particular, this meant that in most cases public assistance recipients were also eligible for the Food Stamp Program.

The growth of the program brought changes in both design and implementation, as discussed in the last chapter. One of the more important of these changes for eligibility determination was the establishment of dual eligibility under the 1970 (1971) Amendments to the Food Stamp Act. Under this system, all public assistance (PA) households were automatically eligible, because of their status, to participate in the Food Stamp Program. All other households were to meet federally set standards. This system remained in operation until the passage of the Food Stamp Act of 1977, which was implemented in January 1979.

As Table 2.1 illustrates, there were some substantial differences in categorical eligibility as it existed before 1979 and as it was reinstituted under the 1985 Act. Probably the single most important factor for determining eligibility and benefits is that under prior law the net income determinations used to calculate public assistance benefits for PA cases were also used to calculate food stamp benefits for those cases. As a result, food stamp benefits for PA cases were effectively based on income determinations made using PA rather than

Table 2.1

Differences in Categorical Food Stamp Program Eligibility for Public Assistance Recipients As Specified in the Food Stamp Act of 1964, the 1970 (1971) Amendments to the Food Stamp Act, and the Food Security Act of 1985

Provision:	Food Stamp Act of 1964	1970 (1971) Amendments	Food Stamp Act of 1985
Categorical eligibility applies to:	At states' discretion; generally, AFDC recipients, general assistance recipients, and recipients of aid to the aged, blind and disabled.	AFDC recipients, GA recipients, and SSI recipients if in otherwise PA households. Households with both PA and NPA persons generally considered NPA households.	Persons in "pure" AFDC and SSI households (counting only AFDC and SSI recipients). GA recipients excluded.
Asset eligibility rules:	At state discretion.	Subject to PA rules for PA cases; to FSP rules for NPA cases.	Subject to AFDC or SSI rules, as applicable, for PA cases; FSP rules for NPA cases.
Income determination and deduction rules	Local PA rules used for all FSP cases.	PA rules used for PA cases, FSP rules used for NPA cases.	FSP rules used for all cases.

FSP rules. Under the new provision, FSP income determination rules and deductions must be used for all cases, whether or not they are PA recipients. On the one hand, this reduces the potential administrative savings in the program, as will be discussed in the next chapter, but on the other hand it also limits the extent to which benefits are likely to differ for the PA and NPA caseloads.

A second cause of eligibility differences between PA and NPA cases under prior law—differences in the eligibility rules applying to the cash public assistance programs and those for the Food Stamp Program—is also of substantially less importance than was the case in the 1970s. Changes in the rules for public assistance programs, particularly AFDC, have substantially tightened their eligibility standards over the past decade. As a result, there are now relatively few cases in which persons eligible for AFDC would not also be eligible for the Food Stamp Program. The next section of this chapter explores the remaining differences in eligibility standards and countable income rules under the two programs in detail, in order to identify the types of cases that could potentially be affected by the new FSP categorical eligibility rules.

Impacts of Categorical Eligibility for AFDC Recipients

Although most of the existing differences between the rules governing eligibility in AFDC and Food Stamp Programs would have little impact on categorical eligibility determinations, some substantial differences between the two programs still exist. In the AFDC program, for example, States still determine their own "standards of need" for various family sizes, instead of applying a uniform

national standard as in the FSP. Families that meet all other criteria are eligible for AFDC if their gross income falls below 185 percent of the need standard for their family size. They receive benefits if their net income (gross income minus allowable deductions, discussed below) is below the state's payment standard. Only 23 jurisdictions set their payment standard for AFDC equal to their need standard. Others use a legislated proportion, ranging from 31 to 90 percent. Thus, many families are technically eligible for AFDC without in fact having low enough income levels to qualify for any benefits. These families would not become categorically eligible for the FSP under the new provisions, since they are not currently AFDC recipients.

Changes in real benefit levels over time are another area in which the two programs have differed substantially. The indexing of Food Stamp Program benefits to the cost of the Thrifty Food Plan allowed them to keep pace with inflation in the late 1970s and early 1980s. States' AFDC standards, on the other hand, are not typically indexed, and most have not matched the rising cost of living since the mid 1970s. Only three States' benefit levels have remained constant or increased in real terms since 1970. For the median State, AFDC benefits for a family of four declined in real terms by 33 percent over the 1970 to 1987 period.[1]

As a result of this decline in AFDC benefit levels, no State currently has an AFDC payment standard that is higher than the FSP net income cutoff, although some States do have AFDC gross income

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1. U.S. Congress. House of Representatives. Committee on Ways and Means. Background Material and Data on Programs within the Jurisdiction of the Committee on Ways and Means, p. 432.

standards higher than the income-eligibility ceiling for the FSP.[2] Because families must meet both gross and net income tests to qualify for AFDC benefits, however, and net income must be lower than the state payment standard, those with high gross incomes generally will not qualify for AFDC, since their net incomes will also be too high.[3] Under AFDC Program benefit computation rules, families with net incomes higher than their State's payment standard will not receive any AFDC benefit, regardless of their gross income level. Since AFDC payment standards are lower than the FSP net income cutoff in all States, as seen above, all single family households that have incomes low enough to receive AFDC payments will also qualify for the FSP on net income grounds.[4]

If differences in income cutoffs were the only factor affecting eligibility, then, categorical eligibility for AFDC recipients, at least, would have little effect on FSP participation and benefit costs. Other differences in program rules may also have some important eligibility impacts, though. Two types are of special interest here.

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2. In January, 1987, eighteen States had gross income eligibility ceilings in AFDC that were above the income cut-off for the FSP.

3. Allowable deductions in the AFDC program are in general somewhat more restrictive than in the FSP, so that it is very unlikely that an AFDC unit could have a gross income over 130 percent of the federal poverty line (the FSP gross income cutoff), for example, and still have a net income low enough to qualify for benefits under any State's current payment standard, all of which are below 100 percent of the poverty level.

4. Households containing more than one family present a special case, and will be discussed below.

Table 2.2

Different Income Counting Rules for AFDC and Food Stamp Programs

	FSP	AFDC
Earned Income	18% of earned income is disregarded in eligibility and benefits calculations.	$30 per month is disregarded in the first year of employment. An additional one-third may be disregarded for the first four months of employment.
Room and Board Payments Received:	Payment received, minus the cost of the Thrifty Food Plan for the number of boarders, is counted as household income.	10% of payment received is considered income.
Casual Income (e.g., babysitting, odd jobs):	Up to $30 per quarter is exempt.	$60 per quarter is exempt.
College Work Study:	Counted.	Exempt.
WIN payments:	Counted.	Exempt.
Foster Care Payments:	Counted.	Exempt.
Unearned Income		
Non-tuition Student Grants (e.g., Pell Grants):	Counted.	Exempt, if based on need.
Child Support Payments:	Counted.	Up to $50/month disregarded.

Table 2.2 (continued)

	FSP	AFDC
Other Considerations		
Stepparent Income:	As a member of the household, all of stepparent's income is included.	A stepparent may withhold that portion of his income representing the State need standard for one adult (and any other dependents he supports who are not part of the AFDC unit).
Income of an Ineligible Alien over 18:	Illegal and temporary resident aliens are not eligible to participate in the FSP. However, the income of an ineligible alien living in an otherwise eligible household is counted in that household's income.	1) If the earner is a stepparent, the income is treated as stepparent income. 2) If the ineligible alien is a parent (e.g., a mother who wants to apply for benefits for her eligible children) a portion of her income may be withheld for her own support; need and payment standards for the children only are applied.

Note: There are other differences in the rules, not listed here. This table is only meant to summarize types of income which may preclude participation in the Food Stamp Program without affecting AFDC eligibility. Categorical eligibility will affect those persons with amounts of these types of income sufficient to have disqualified them from FSP participation under prior law.

Determination of Countable Income. The first major set of rule differences affecting eligibility in AFDC and the FSP regards what is counted as income. Because the components of countable income differ across the two programs, AFDC families might gain eligibility from the new rule if they receive certain types of income that are not counted under AFDC rules, but are counted by the Food Stamp Program.

Pell Grants to undergraduate students are an example of such an income type, and an example concerning a Pell Grant recipient may clarify the impacts of such definitional differences. Suppose a woman with a child is trying to work her way through college. Her part-time job does not pay enough to render her ineligible for AFDC payments, and the two types of income combined (AFDC plus earnings) are still insufficient to disqualify her from receiving food stamps. If she receives a Pell Grant to help pay her school expenses, however, she might exceed food stamp income eligibility standards, and would not have been eligible for food stamps under prior law. Because the AFDC program does not count educational grants to full-time students as income, this mother's AFDC payments would be unaffected by the grant, and so, as of December 23, 1985, she is also (categorically) eligible for the Food Stamp Program.[5]

In addition to the Pell Grants, a few other types of income may affect a household's "food stamp income"—what is counted for Food

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5. Although this situation is probably relatively uncommon, FNS staff report that at least two applications for eligibility redeterminations were received from families receiving both AFDC and Pell Grants in the period immediately after passage of the categorical eligibility legislation.

Stamp Program eligibility determinations—while being ignored or treated differently for AFDC purposes. These income types are summarized in Table 2.2.

While it is not thought that many AFDC recipients receive these types of income, or if they do, that they typically receive enough to disqualify them for food stamps, there does not appear to be any solid evidence in this area. Program administrators in Fresno and San Diego counties, which sponsored simplified application demonstrations relevant to this issue, did comment on the "small numbers of AFDC households that have the types of income which were affected" by the demonstration policies.[6]

Differences in FSP and AFDC Assistance Units. The other set of differences in rules that may potentially affect eligibility determinations are differences in the definition of assistance units. AFDC, as its name indicates, offers assistance to families, which may constitute only part of a household. Food Stamp Program eligibility determinations, on the other hand, are based on a household that buys and prepares food together. There is no requirement that members of a food stamp household be related in any way. A food stamp-eligible household might therefore include more than one AFDC unit, or some AFDC recipients who live with non-recipients. Categorical eligibility does not affect those in the second situation, since they would not

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6. See James C. Ohls, et. al. (Mathematica Policy Research, Inc.). Final Report for the Food Stamp Program Simplified Application Demonstration Evaluation. Submitted to the U.S. Department of Agriculture, Food and Nutrition Service, Office of Analysis and Evaluation. September, 1986. A brief summary description of that project's changes relevant to an assessment of categorical eligibility in its current form will be found later in this chapter.

constitute a "pure" household; but the treatment of food stamp households containing multiple AFDC units does deserve examination. Unfortunately, little is known about the numbers and characteristics of such households.

An example of a household containing multiple AFDC units might be a single woman with a child of her own, who lives with her mother and younger siblings. If both sets of mothers and children receive AFDC, the household as a whole will be categorically eligible to participate in the Food Stamp Program. In this situation, however, the woman's filing unit for the two programs will differ. She and her child will constitute a two-person AFDC assistance unit, while under FSP rules they will be part of a larger assistance unit consisting of the household as a whole.

In some cases, this larger household may have had income or assets above FSP limits under prior law, since it would be eligible to receive two different AFDC benefits, and eligibility for each benefit would be separately determined. Under the new law, however, this household would be categorically eligible, as discussed above.

If a significant number of the pure AFDC households contain multiple AFDC units, then categorical eligibility could have some impact on participation in the Food Stamp Program. Categorical eligibility could potentially affect two types of multiple AFDC-unit households that previously would have been disqualified. First, some larger households receiving AFDC would have been ineligible for the FSP under previous law because the FSP benefit schedule assumes that economies of scale exist in food purchasing and preparation. That is, the difference in food costs between a three person and a two person

household, for example, is assumed to be larger than the difference between a four- and a three-person household. Therefore, smaller households are allowed larger per person incomes while still qualifying for food stamp benefits. Two families combining to make one household will thus be subject to a lower per person income eligibility standard than would have been applied to each family if it lived alone.

An example may help clarify this possibility. Consider two sisters, each with a child and no husband. They live together, own one car worth $2000, and have almost no savings. Each family meets the assets test for AFDC and as a household they meet the Food Stamp Program's asset test.

If this household resides in a comparatively high AFDC benefit state, they may both work full time at low wage jobs and receive AFDC benefits as two separate assistance units. At some level of income before they jeopardize their AFDC eligibility status, however, they would be declared ineligible to participate in the Food Stamp Program. A four-person household may earn no more than $1193 gross and $918 net income in a month and retain eligibility for the Food Stamp Program. On the other hand, two two-person families may <u>each</u> earn, using Vermont as an example,[7] up to $1291 gross and $461 net monthly income without losing their eligibility for AFDC. In addition, two families are allowed two sets of AFDC deductions and two earned income

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7. Vermont is a high-benefit State, ranking fifth in AFDC payment levels to a four-person family in 1986. The probability that a household will be made newly (categorically) eligible declines as a State's payment standard falls further from the FSP net income level. See Table 2.4 in the summary of this chapter for an estimate of such potentially new participants nation-wide.

disregards. If these sisters find full-time jobs paying $4.25 per hour ($700 per month), and work different shifts in order to be able to share the child care responsibilities, the calculations for the first four months of their employment could look like this:

Table 2.3

AFDC and FSP Gross and Net Income Calculations for an Example Household Containing Two AFDC Units

	ANNE'S AFDC UNIT	BETH'S AFDC UNIT	FOOD STAMP HOUSEHOLD UNIT
Gross income	700	700	1400
Work Expenses/Standard deduction	75	75	99
Earned income disregard ($30 plus 1/3 remainder for AFDC, 18 % of gross for FSP)	228	228	252
Net income[8]	397	397	1051

In nine States (or parts of them), Anne and Beth are eligible for AFDC benefits and are thus categorically eligible for food stamps under the new law, though the table shows that their household gross and net food stamp incomes are higher than FSP regulations allow.[9] As a consequence, they must remain on the office's rolls, even though they would be entitled to a zero benefit, as the following calculation illustrates. The maximum monthly allotment for a household of four

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8. FSP net income is shown as that received before the AFDC benefits. Actual total Food Stamp Program net income would be even higher.

9. Several States have regional AFDC need and payment standards, to reflect the higher cost of living in urban areas. Some States also have higher payment standards during the winter months. This arbitrarily chosen income situation would affect some households in some parts of nine States. Different combinations of income and living arrangements may cause others to be affected by categorical eligibility in much the same way.

($274) is reduced by 30 percent of net income under FSP rules. Since 30 percent of $1,050 is well above $274, the sisters' allotment would be reduced to zero even before the AFDC payments are taken into account. In fact, they could earn substantially less and still fail to qualify for FSP benefits.

The second type of previously ineligible household containing multiple AFDC units that categorical eligibility may affect is the household that would have been disqualified because of their assets. Multiple family units are allowed multiple deductions and are subject to multiple asset limits under AFDC rules. In 1978, FNS estimated that between 18 and 28 percent (3 to 6 million) of income-eligible households became ineligible for the Food Stamp Program when the assets test was applied.[10] Though most of these households probably will not be affected by categorical eligibility, the possibility that some of them are pure PA households does remain. A two-family, two-car AFDC household, for example, might easily be disqualified under FSP rules.

Suppose that their town's leading business files for bankruptcy, and Anne and Beth lose their jobs. In her months of working, however, Beth has been able to purchase a car for $1495. She no longer needs to rely on her sister for transportation, and the value of the car is low enough to exempt it from counting towards the AFDC asset standards. Because the household now owns two non-exempt cars, however, one must be counted towards the FSP asset limit. If they have over $505 in savings or other assets between them, the sisters

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10. U.S. Department of Agriculture. Food and Nutrition Service. Assets of Low Income Households: An Analysis of Existing Data. (n.d., circa 1978), p. 10.

would have been declared ineligible to participate in the Food Stamp Program before categorical eligibility was instated, if they lived in a state that had not implemented resource eligibility for PA households. The cars could have lower value and still cause their owners to be disqualified if the household has a higher level of other assets.

Though this scenario does offer the potential for an increase in FSP participation, it is probably not a very common occurrence. It is unlikely that there will be a large number of multiple-car or other substantial asset-holding AFDC households who could be affected by categorical eligibility. The number of potential new participants is further reduced by the fact that 25 States had already implemented "resource eligibility" for AFDC recipients when the Food Security Act of 1985 was passed, relieving such recipients of the need to meet FSP asset tests as well as those for AFDC. Categorical eligibility would have no further impacts on asset tests for residents of these States.

Thus categorical eligibility's greatest impact on Food Stamp Program eligibility for AFDC recipients will probably be to enable some previously ineligible households to gain eligibility--although in most cases these households will gain eligibility only, and will not actually qualify for any benefit. In all but the lowest AFDC-benefit States, households receiving more than one AFDC benefit are likely to have incomes high enough so that 30 percent of net income is higher than their potential food stamp benefit, as in the first example outlined above. In such a case, as seen there, the household would

technically become eligible for the FSP, but no benefit would be received.[11]

Impacts of Categorical Eligibility For SSI Recipients

In general, the impacts of categorical FSP eligibility for SSI recipients are also likely to be small, since in most cases SSI benefit levels are below FSP net income cutoffs, and relatively few SSI recipients have total incomes significantly above the program's payment standard.[12] In three States, however, the combined Federal and State SSI payment to couples exceeds the Food Stamp Program's net income limit. If couples in the States of Alaska, Colorado, and Massachusetts had no excess shelter or medical deductions, they might have previously been ineligible for the FSP. The chart below illustrates this possibility. Not many couples are likely to fall into this category, as SSI recipients tend to qualify for medical deductions and are likely to receive the excess shelter deduction as well, but there may be some for whom this situation would hold.

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11. Households with two or fewer members (possible for households containing multiple SSI units, but not for those containing AFDC units) would become eligible for the $10 minimum food stamp benefit.

12. Above certain small allowable deductions, SSI benefits are reduced dollar for dollar for any unearned income received, thus limiting the total income such recipients may have to a level close to the payment standard. Earned income is subject to a higher basic disregard, and benefits are reduced by only 50 cents for each dollar of earnings received over the disregard level. Thus, as discussed below, recipients with earnings may qualify for benefits that would bring their total incomes significantly over the SSI payment standard. In practice, however, very few SSI recipients receive significant earnings, as is discussed further below.

State	SSI Net Limit	FSP Net (including the $99 standard deduction)
Alaska	$887	$722 (+$99) = $821
Colorado	$788	$576 (+$99) = $675
Massachusetts	$706	$576 (+$99) = $675

Because the SSI program allows higher levels of earned income than of unearned, categorical eligibility may have a further impact on FSP participation among SSI recipients with earnings. In a State that did not supplement the federal payment, for example, a single person meeting other requirements could earn up to $757 per month (well above the FSP standard of $415 net) and continue to receive SSI benefits. In one of the 27 States that provide SSI supplements to single persons the amount earned could be higher. Any SSI earners with total incomes over the FSP net income standard would have become newly eligible under the 1985 legislation.

It will be important to discover how many SSI recipients are affected by this change in FSP eligibility. As elderly or disabled persons, SSI beneficiaries have not been subject to the gross income limit imposed on other applicants for the Food Stamp Program. With the implementation of categorical eligibility, they need not worry about FSP net income eligibility limits either. An individual may make well over the FSP monthly net income limit of $415 for a single person, retain SSI benefits, and thus may be eligible for the $10 minimum FSP benefit. (Eligible one or two person households receive at least $10 in benefits under FSP rules, even if the benefit formula yields a lower figure.)

SSI recipient couples with earned income may also benefit under the new regulations. The SSI earned income limit for a couple is $1093 per month—well above the FSP standard of $560 net. Some of

these singles and couples may have been eligible for food stamps before categorical eligibility, however, even if their earnings were fairly high, because their deductions for shelter and medical costs are not subject to a cap, as are those of non-elderly, non-disabled applicants. It is not immediately clear how many persons would be made eligible by virtue of the new rule alone. It is known that only 3.2 percent of SSI participants (about 162,000 persons) report any earned income, however.

Without taking deductions into account, in a State that does not supplement SSI benefits a single person would have to earn at least $420 per month to be made eligible by virtue of the new rule alone. (In a supplementing State, this earnings figure is lower.) Otherwise, this person would have been eligible for the Food Stamp Program before categorical eligibility was established. For couples receiving SSI, the corresponding figure would be earnings of at least $350 per month. Persons or couples with lower earned incomes would already be eligible for the Food Stamp Program under FSP rules.[13] Even among the small proportion of SSI recipients with earnings, therefore, few would qualify as the result of categorical eligibility alone. Still, there will be some for whom this is the case--as an upper bound, the 3.2 percent of recipients known to have some earnings.

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13. SSI rules include a comparatively high work expenses disregard. Since SSI only disregards earned income ($65 plus one-half the rest), those who rely on unearned income, but do not have enough to disqualify them for SSI, would be eligible for the FSP as well. Unearned income limits for SSI are lower than for the FSP.

Summary: Major Groups Likely to Gain FSP Eligibility as the Result of Categorical Eligibility Provisions

This chapter has summarized participation and eligibility parameters in AFDC and SSI as they pertain to categorical eligibility for the FSP. It has been found that program differences would result in some expansion of eligibility under this provision.

What remains, then, is to find out how many of these various potential beneficiaries of categorical eligibility exist. How many SSI recipients have noteworthy earned income? How many recipients live in pure PA households? Of those, how many do not currently receive food stamps? For those who do not, is it because they are part of a household containing multiple AFDC or SSI assistance units? Or is it because their income counted under FSP rules is too great?

Establishing answers to these questions is problematic. While several good studies of program participants' characteristics and financial status are available, certain crucial questions remain unanswered. This section will summarize what is known, provide an upper-bound estimate of participation by type, and explain what remains to be ascertained before a final estimate of categorical eligibility's effects on participation can be given.

The major categories of persons that would be affected by categorical eligibility, and upper-bound estimates of their numbers, are shown in Table 2.4. Some relevant information regarding these categories comes from the Simplified Application Demonstration.[14] This demonstration project, conducted at four sites (Illinois, Oklahoma, Fresno County, California, and San Diego County, California)

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14. See James C. Ohls, op. cit.

Table 2.4

Preliminary (Upper-bound) estimates of FSP Participation Increase as a Result of Categorical Eligibility

Group Affected	Number Affected	Likely Effect
Recipients of income counted by FSP but not by AFDC	Unknown. Based on QC data, probably a rare occurrence—perhaps 1,000 households nationwide at most.	For 2 person household, now eligible for $10 minimum FSP benefit. All others eligible for zero FSP, since benefit calculating rules remain unchanged.
Multiple AFDC unit households with earned income above FSP limits	Only 6 percent AFDC families (223,000) reported any earnings in FY84. Further limited by the specific AFDC limits in various States. (In only nine States can this situation occur.)	Eligible, but for zero benefits
Multiple AFDC unit households, each family having assets near the AFDC maximum	Only 17.6 percent of all AFDC families had any assets in FY84 (appx. 656,000). (For this category and the one above, it should be noted that in Illinois 3.4% of pure AFDC households included multiple units.)	Possibility of non-zero, above minimum benefits for a few households.
Single SSI recipients with an earned income of at least $420/month in non-supplementing States. (Income figure varies among the 27 States that supplement SSI payments.)	Only 162,015 SSI recipients reported any earned income in FY 1985. The average amount of monthly earnings, for those who worked, was only $163.12, so few of these earners will actually fit the affected category.	Certification for the $10 minimum FSP benefit
SSI recipient couples with earned income of at least $350 per month (with variances as noted above for singles).	Only 162,015 SSI recipients report any earned income in FY 1985. The average amount of monthly earnings, for those who worked, was only $163.12, so few of these earners will actually fit the affected category.	Certification for the $10 minimum FSP benefit
SSI recipient couples with no FSP deductions in the high benefit States of Alaska, Colorado, and Massachusetts	137,308 adults received SSI in these States in 1985. Number of them living as a couple, and have no excess shelter or medical deductions, remains to be seen.	Certification for the $10 minimum FSP benefit

tested different approaches to simplifying the administration of the Food Stamp Program. While each site developed and implemented its own version of simplification (with guidance and approval from FNS), all four concentrated on simplifications involving recipients of other program benefits.

The California sites' version of the Simplified Application Demonstration provisions most closely approximated the provisions of categorical eligibility. Though the current form of categorical eligibility does not allow the use of AFDC income definitions for food stamp benefit determinations, as did the demonstrations, making AFDC households categorically eligible has the effect of using those definitions in making eligibility determinations. If AFDC program workers determined a household to be eligible, the FSP administrators would accept that judgment for their own eligibility purposes.

Under prior law, approximately 80 percent of AFDC recipients were estimated to be already participating in the FSP. The Simplified Application Demonstration Evaluation findings support those estimates, indicating that there is unlikely to be a large reservoir of non-participants among the AFDC population. In the demonstration project's four sites, between 75 and 92 percent of the subject population received FSP benefits before the demonstration. Of those who were not beneficiaries, about one-half would not be affected by categorical eligibility anyway because they live with other persons who do not participate in the AFDC or SSI programs. The evaluation report for the project concluded that perhaps one percent of the Fresno, California caseload was drawn in by the demonstration rules, and the other sites experienced significantly less increase.

A look at characteristics of AFDC participants shows why this is nearly all that can be expected from the change. As noted, barely half the AFDC participants live with only other participants. This is a deep first reduction of the potential change resulting from categorical eligibility, since nearly half of AFDC recipients are not affected. Another reason not to expect many new eligibles is because almost all pure AFDC households already participate. Those who do not are those with special types of income. Even if the Pell Grant recipient and Anne and Beth--the examples discussed earlier--do gain eligibility, the food stamp benefit worksheet would show their benefits to be either the $10 minimum, in the first case,[15] or zero, in the second. Still, the size of the possible eligibility increase may affect program costs. Other than for two-car, multiple-family AFDC households in non-resource eligibility states (and, as discussed below, SSI recipients with incomes above the FSP net income cutoff), this cost increase will tend not to be the result of persons receiving new benefits. Rather, it will likely be a reflection of the administrative costs of certifying PA households for zero benefits.[16]

It appears that a similar situation exists among SSI recipients. Though the FSP participation rate among SSI recipients is lower than that for AFDC beneficiaries,[17] any increase in eligibility the new rule brings will be predominantly for the minimum benefit. Most new eligibles will fall into the one or two-person household categories

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15. She will qualify for the minimum benefit if she has only one child. Otherwise, she is eligible for a zero benefit.

16. This cost will be discussed further in the next chapter.

17. The current rate is near 50 percent.

with earned incomes (or with unearned incomes over the FSP net, in those states with high SSI benefit levels) and will receive low benefits. The Simplified Application Demonstration, for example, found that 85 percent of the SSI households sampled in Oklahoma received the minimum food stamp benefit. (All of these households received some benefits because of their participation in the project.)

Even those newly eligible for the minimum are likely to be a small group. For example, in Oklahoma the demonstration affected only three of 2,520 food stamp allotments by using SSI definitions and rules, in lieu of the FSP's, for counting income.

As an estimate of the maximum participation increase due to categorical eligibility, then, it is unlikely that as many as 200,000 persons will be affected. (The FSP served more than 21 million persons in 1986.) Even this estimate would require several assumptions. Five percent of the AFDC families with earnings or assets would have to live in multiple assistance unit FSP households and have fairly high incomes or resources. (The Simplified Application found that 3.4% of the pure AFDC households in Illinois were such multiple units.)[18] Further, half of the SSI recipients with earnings would have to earn more than $420 per month for a single person, and $350 per month for a couple. As discussed above, SSI earned income averages only $163 for those who report receiving any. Finally, an upper bound estimate of 200,000 assumes that most SSI recipients in Alaska, Colorado, and Massachusetts live as a couple and qualify for little or no excess shelter or medical deductions—also relatively unlikely. Thus, further research into the earnings,

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18. See James C. Ohls, op. cit., p. 2.121.

assets, and living arrangements of the AFDC and SSI population is needed in order to refine an estimate of categorical eligibility's effect on FSP participation.

III. PROGRAM ADMINISTRATION

If categorical eligibility enables workers to eliminate duplication in determining FSP eligibility, then savings will result. Conceivably, employee morale may be enhanced as well, leading to fewer errors and more efficient administration. These, along with the prospect of improved program access for applicants receiving cash public assistance, were the principal rationales behind the recommendation of the President's Task Force on Food Assistance: "Simplify application procedures in the Food Stamp Program. Specifically, we recommend categorical eligibility for all AFDC and SSI households."[1] Similarly, Mary C. Jarratt, former Assistant Secretary for Food and Consumer Services of the USDA, told the Senate Agriculture Committee, "[Categorical Eligibility] would give caseworkers more time to devote to other activities."[2] Support for this view was provided by the Director of Oklahoma's Department of Human Services, who told another hearing that the Simplified Application Demonstration, which implemented a form of categorical eligibility on a demonstration basis, was proving to be a boon to overworked offices in his state.[3] These factors were clearly important in the decision to move to categorical eligibility. The Senate Committee Report accompanying the Food Security Act, for example, stated: "Many States may be able to gain part of the advantages of the simplified application aspect of the provision by the use

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1./U.S. President. Report of the President's Task Force on Food Assistance. January, 1984. p.44 (Recommendation 2e).

2./Hearing before the Committee on Agriculture, Nutrition, and Forestry, U.S. Senate. April 25, 1984. (Senate Hearing 98-995), p.3.

3./Robert Fulton. Statement to Committee on Agriculture, Nutrition, and Forestry, U.S. Senate. June 14, 1985.

of the categorical eligibility established in the bill."[4] The House Committee Report that accompanied their version of the bill closely echoed this sentiment. "The Committee expects that categorical eligibility will reduce the administrative time needed to handle their cases, thereby allowing administrative resources to be more efficiently allocated, without loosening food stamp eligibility requirements."[5]

Thus it was that Congress, acting on the President's Task Force recommendations, testimony before the House and Senate Agriculture Committees, and the perceived need to simplify program administration, required the Food and Nutrition Service to implement categorical eligibility for households in which all members receive Aid to Families with Dependent Children or Supplemental Security Income. Since a major rationale for this action was its hoped-for reduction in administrative burdens, the impacts of categorical eligibility in this area are clearly important to an assessment of the success of this measure as a whole.

Although many have advocated categorical eligibility as a cost-saving measure, little evidence exists regarding the effort or costs that would be saved. Prima facie, some savings might be expected simply because so many FSP cases are also AFDC or SSI recipients. The FSP serves approximately 7.72 million households in any given month. Of these, roughly 40 percent (3.1 million) also receive AFDC benefits, and 20 percent participate in the SSI program. (There is some overlap, as a household may receive both types of

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4./Senate Report (Agriculture, Nutrition and Forestry Committee) No. 99-145, September 30, 1985 [To accompany S. 1714], p. 254.

5./House Report (Agriculture Committee) No. 99-271 (I), September 13, 1985 [To accompany H.R. 2100], p. 142.

assistance.) Some of these households may also contain some non-AFDC or SSI recipients but the most recent figures indicate that AFDC is the only source of income for 30 percent of FSP households, while SSI-only households account for another 5 percent of the FSP caseload.[6] It is likely that the great majority of these households do indeed meet the pure-PA definition. It was hoped that categorical eligibility would ease the administrative burden of processing these 2.7 million households' applications and certifications.

Unfortunately, however, because FSP benefits are still determined under FSP rules, even under categorical eligibility, the case worker must collect much of the same information from the applicant as was previously required. If simultaneous applications for the FSP and one of the other public assistance programs are made, some reduction of information collection may indeed result. Little national data is currently available, however, that would make it possible to estimate how often such simultaneous applications are made. Even when they are, it is not clear just how much time might be saved, or what caseworkers are likely to do with any time saved. The next section explores these issues through an examination of the FSP application procedures, and categorical eligibility's potential effect on them.

6./U.S. Congress. House of Representatives. Committee on Ways and Means. Background Material and Data on Programs within the Jurisdiction of the Committee on Ways and Means. March 6, 1987, pp. 500-501.

Application Procedures in the Food Stamp Program

A person or family who decides to seek public assistance typically will call or visit the local welfare office to make an appointment. With but a few exceptions, Food Stamp Program rules require a personal interview with an eligibility worker (EW), or caseworker. The caseworker must ask a rather lengthy list of questions about income, assets, household composition, and employment. The answers to these questions are necessary to enable the caseworker to determine the applicant's need. The applicant may have partially completed the application form obtained at a previous visit. If so, the personal interview will be used to complete the application or clarify any remaining questions.

The interview serves as the first of six tasks confronting the eligibility worker in processing an application for the Food Stamp Program. After the interview takes place, the worker must verify the information obtained. Verification requires documentation of certain applicant statements. Examples of acceptable verification documents include wage stubs, bank books, or rent or utility receipts. Alternatively, the caseworker may need to contact third parties, such as landlords, bankers, or employers.

The third step is to evaluate the information that has been obtained and verified. This requires the caseworker to judge which assets must be counted, whether the household meets the gross and net income tests, and the amount of benefits it is entitled to receive, if any. The household must then be notified of the decision — the fourth step.

If the household is deemed to be eligible to receive benefits, the worker needs to authorize them to participate, the fifth step. This may be combined

with the prior step, that of notifying the household of the eligibility determination. In future months of the household's certification, they will still need to receive the authorization. The method for doing this varies by jurisdiction. The final step is to make a record of the case and store all pertinent information in the Food Stamp Office's files.

Categorical eligibility can be expected to affect the process at the first three steps, to varying degrees. At the time of application and interview, PA households in some States may be able to fill out a shorter form. In States which have closely integrated AFDC and FSP offices, the caseworker will not need quite so much information from the PA applicant. This may lead to a reduction in the amount of information that needs to be verified. In fact, however, much of the necessary verification may have already been done in the AFDC or SSI application process, since information regarding household size and composition, residence, work status, and assets are as important to the AFDC and SSI program as they are to the FSP.

Further possible benefits from categorical eligibility may be seen in the evaluation stage. If the household has pure-PA status, the eligibility worker does not need to evaluate asset information to determine eligibility as would previously have been necessary in about half the States (those without resource eligibility for AFDC and SSI recipients). Nor does the worker have to assess the household's compliance with work requirements, if it participates in one of the AFDC work programs. (By definition, households receiving only SSI are not subject to work requirements, since a person must be aged or disabled to receive SSI, and the FSP exempts such persons from the work requirement.)

Categorical eligibility's potential savings in these areas are limited by other factors, however. For example, some households may not apply for AFDC or

SSI before applying for the FSP, limiting the potential for administrative savings. Further, in the 25 States that had already implemented resource eligibility, the reduction in asset information required had been realized already. In some offices, the savings potential in the verification step may be further restricted by a lack of program integration. If workers or offices are specialized by program, the benefits of earlier or simultaneous verification may be lost even if the household already participates in a public assistance program.

It is the continued use of different program rules regarding income and benefit calculations which presents the greatest obstacle to full realization of possible administrative savings, however. Even pure PA households must have their income and benefits (though not eligibility) calculated on the basis of FSP rules. If the household receives income that is treated differently by the two programs, or if it is composed of multiple AFDC/SSI units, then no administrative savings may be realized in the processing of its case.

Categorical eligibility will have little impact on the other three steps. The impact that it does have is likely to be on the final area, and to be negative. Like the first stage (the interview), the record-keeping stage will offer no room for savings when the household is not already participating in a public assistance program, and some problems may arise at this stage as a result of categorical eligibility.

A second potential record-keeping problem may arise in some cases of simultaneous FSP and AFDC application. It is possible, under categorical eligibility, for a household to be certified as eligible, but only for a zero benefit (see discussion of this point in Chapter II). The categorical eligibility regulations could be interpreted to mean that such cases must be

maintained in the files as active cases, which could impose a substantial record-keeping burden. It is not yet clear how States will interpret this aspect of the regulations, however. Food Stamp Program regulations require that the agency dispose of a case within 30 days of application. The household must be notified, and receive benefits if eligible, within that time. The AFDC program, on the other hand, has a 45 day limit on eligibility determinations. When a simultaneous application is made, and a decision on AFDC eligibility is not returned within 30 days, the food stamp caseworker must suspend the decision on FSP eligibility. Applications resulting in suspended cases are not likely to be a large proportion of the caseload, but they do present problems when they occur.

Categorical eligibility is not the cause of all the potential problems in this area, however, since an analogous situation existed before its passage. Previously, if a household received AFDC after FSP eligibility had been determined, FSP benefits needed to be recalculated anyway. The thornier problem arises when the FSP worker would have previously determined that the household was ineligible. Now, if the AFDC decision is not returned within the FSP 30 day limit, the worker must keep the file open as an ineligible NPA case that may become categorically eligible when the AFDC decision is reached.

Since most households have minimal contact with the food stamp office after they are certified, the effects of categorical eligibility on the administrative process will be for the most part limited to the first application. Changes in household composition or benefits, however, such as a change from pure PA to NPA status will require the caseworker to redetermine FSP eligibility and benefits on the basis of the new status. Based on previous studies, this can be expected to take anywhere from a few minutes to an hour of

caseworker time per change.[7] The extent of such switches is unknown, though not thought to be great. Household composition changes occur among a minority of PA participants, and are especially unlikely among SSI recipients. Also, it is only those with earned income or a recent work history who must report their income and other information monthly, unless the State chooses to expand the "required" category, so some changes in PA households may not be detected until recertification.

Office Procedures and The Impacts on the Administration of Categorical Eligibility

The impacts of categorical eligibility will in practice depend not only on the characteristics of the FSP caseload, but also on the specific procedures used by local welfare offices to process cases. If FSP and AFDC applications are already processed jointly, for example, categorical eligibility may result in fewer savings than if processing is done separately, since many of the information collection and verification processes outlined above may already have been combined for the two programs. Similarly, if SSI cases are currently treated as NPA cases and are processed separately from AFDC cases, it may be relatively difficult for local offices to identify mixed AFDC and SSI households as categorically eligible — and by the time such a determination is made, all the relevant information may already have been collected and verified separately for each program. For these reasons, this section briefly outlines

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7./William L. Hamilton. Food Stamp Program Operations Study, Census of State Operations: Monthly Reporting Systems, Table A.23. The larger project was undertaken for the FNS by Mathematica Policy Research (with Abt Associates and the Urban Institute). This piece reports that estimates of caseworker time required to change a file or render a household ineligible because of information acquired on the monthly report forms ranged from 6 to 60 minutes. For both categories of activity, the median estimate (N=35 States responding) was 20 minutes.

some of the different procedural options available to food stamp offices, and considers their impacts with regard to categorical eligibility.

In general, local welfare offices may or may not be organized so as to facilitate multiple program applications. In many offices, the same caseworkers handle both AFDC and Food Stamp Program applications. In fact, if a person wishes to apply for both programs at one time, they must be allowed to do so. Workers must learn, and stay abreast of changes in, the complex regulations concerning eligibility and benefit determination for both programs. On the other hand, with numerous programs to administer, some larger offices opt for specialization at both the intake and ongoing levels. In these situations, a joint AFDC and FSP application may be handled by more than one worker.

In addition, some caseworkers must evaluate FSP applications received from the local Social Security Office, since Supplemental Security Income recipients are allowed to apply for the Food Stamp Program at their Social Security Office. These applications are then mailed to the Food Stamp office, where they may be processed either by caseworkers who specialize in SSI cases or by workers who handle either PA or NPA cases in general. (Some offices consider SSI cases to be part of the PA caseload, while others treat them as NPA cases). For SSI cases, the caseworker must follow much the same procedure as was outlined above, except that SSI recipients are not required to have a personal interview. All other steps proceed as for non-SSI cases, using the information collected on the application form filled out at the Social Security office. In most cases, this information is sufficient to process the case, but in some cases additional materials must be supplied for verification purposes. These materials can often be supplied by mail, however.

Once a household is determined to be eligible for the Food Stamp Program, it is generally certified for a period of several months. Although six months is the standard certification period (the same as in AFDC), one to twelve month periods may be used. The certification period's length depends on the likelihood of changing household circumstances. Thus a retiree living on a fixed income is likely to be certified for a longer time than a younger person with a family and a current or recent work record. The office must also decide, using national or State guidelines, whether the applicant is subject to monthly reporting. Under categorical eligibility, offices may interpret the new regulations to imply that all of the newly eligible cases, even those eligible only for a zero benefit, must be notified and reviewed for periodic recertification, and even required to engage in monthly reporting where applicable. To the extent that offices have relatively inflexible computer systems, it may be difficult, at least in the short run, for them to maintain these cases as active files without issuing periodic recertification and monthly reporting notices.

In most respects, recertification for food stamp benefits is similar to the original application process. The Office of Inspector General did note in 1982, though, that several million dollars in coupons had continued to be issued to households who had not gone through recertification, but whose eligibility was automatically extended, or rolled over. The obvious reason these errors were made would seem to be that staff was overloaded. If this is the case, and categorical eligibility helps reduce the office or caseworker workload, then these errors may decline.

Finally, offices also differ in the extent to which they are automated. Highly automated offices may reap very few administrative benefits from

categorical eligibility, if most of the work of determining eligibility is normally done automatically anyway. On the other hand, some computer systems may have problems handling eligible zero benefit cases.

Summary: Major Areas of Potential Administrative Savings and Costs as a Result of Categorical Eligibility

While the possibility of achieving administrative savings in the Food Stamp Program was a major reason for implementing categorical eligibility, its overall magnitude is uncertain. In fact, even the general direction of the effect is unknown. This is because categorical eligibility has attendant costs as well as potential benefits. In order to fully assess its impact on program administration, further research is needed. In this research, attention will have to be paid to areas already known to be affected. The researchers will also have to be aware of any possible unforeseen effects.

Because the current version of categorical eligibility is somewhat different from that in effect in 1976 (most importantly, FSP income and benefit calculation rules must be used even for categorically eligible cases), its administrative effects may also differ. In particular, determining whether categorical eligibility does indeed impart "part of the advantages of the simplified application aspect of the recent demonstration projects" must await answers to the following questions:

- How common are joint applications to the FSP and AFDC or SSI programs, as a percentage of a worker's (or office's) caseload? How does processing time differ for separate applications?
- Are PA and NPA cases processed separately? Do the same caseworkers process a given case for both FSP and AFDC or SSI?
- Is any additional information required to determine the "purity" of AFDC and SSI households?
- Does categorical eligibility reduce the number of steps needed to process such "pure" cases?

- How automated is the eligibility and benefit determination process? How will it handle zero benefit cases?

- Will workers recertify FSP participants when AFDC or SSI eligibility ends? How much time will be involved?

- How will workers handle cases that must await pending AFDC application decisions?

- In general, has the implementation of categorical eligibility resulted in any changes in the eligibility determinations or record-keeping processes?

The answers to most of these questions involve estimates of costs as well as savings. Refinements in administrative cost estimates will depend on our ability to disaggregate the time cost or savings pertaining to each type of action involving a categorically eligible case. It will be necessary to determine the time needed to ascertain purity and to recertify persons dropped from AFDC or SSI participation. Record-keeping procedures implemented in response to categorical eligibility must also be explored, as must the disposition of cases for which AFDC or SSI eligibility decisions are pending. This final situation worried the majority of State administrators who commented on the interim rule's publication, though none of them offered any estimates of the likely frequency of its occurrence.

As the last two sections have illustrated, the overall impacts of categorical eligibility on FSP participation and administrative costs are likely to be small. Nevertheless, there are still a number of issues that deserve further investigation in these areas. The final question to be considered in this paper, the potential for achieving reductions in FSP error rates, is highly related to these components of the FSP. Categorical eligibility's potential effect on this area is considered in the next chapter.

IV. ERROR RATES

The final factor to consider in evaluating categorical eligibility's impact depends to a great extent on the previous two. If categorical eligibility does reduce paperwork burdens for caseworkers, and FSP participation does not increase by a great amount, a reduction in error rates may occur. For example, workers may find themselves with more time available to undertake error-reducing activities if categorical eligibility does result in net time savings for processing PA cases.

If they had perfect information and unlimited time, administrators could always issue exactly the correct benefits as stated in law and regulations. However, because participants sometimes may furnish inaccurate or incomplete information, or workers may be hurried or harried when they evaluate an application, an incorrect amount of benefits is sometimes issued. Overissuances occur in the Food Stamp Program when recipient households receive benefits to which they are not legally entitled. Benefits issued to ineligible households and benefits issued in excess of an eligible household's allowable allotment are both considered overissuances. When errors cause households to receive allotments that are lower than the amount to which they are entitled, they are termed underissuances.

Both types of errors may occur as a result of the recipient's or the State agency's actions. Deliberately or inadvertently, participants may fail to provide sufficient or sufficiently accurate information for determining eligibility and benefit levels. Intentionally furnishing false information is considered fraud, and is punishable by suspension from the FSP and possible criminal

prosecution. Agency errors may occur in the calculation of either eligibility or benefits, and may affect the computation of deductions, income, or assets, for example.

Though the Food Stamp Program provides federally funded benefits to eligible households, it is administered by State and local welfare agencies. Workers there are responsible for determining eligibility and benefits. Administrative costs are shared between the federal government and the States. To provide an incentive for improving the integrity of the FSP, the error rate sanction system was established to hold the States financially accountable for errors made in applying federal guidelines. Agency and client errors in eligibility determination, benefit calculation, or any sort of verification (especially income, assets, and household composition) are subject to review under the Quality Control (QC) system.

This system, established for the FSP in close to its current form in 1977, includes a requirement that each State undertake a statistically valid sample of its monthly eligibility determinations and benefit issuances. These samples are reviewed by an independent State unit, which may use a more detailed verification process than that employed by the caseworker. The percentage of cases found to be in error is projected to the State's total caseload to estimate dollar benefits erroneously issued. Federal reviewers from FNS then validate the results of each State's QC review and incorporate the findings into the State's official error rate. The official statistics serve as the basis for establishing State financial liability for excessive errors.

Thus, categorical eligibility could potentially reduce State costs in two different ways. First, States may realize direct administrative savings, as discussed in the last chapter. And second, to the extent that freed caseworker time allows reductions in errors, some States may also realize gains from decreased sanctions.

The potential for savings resulting from a reduction in error rates is not trivial. Reducing the national error rate from the national average of 9.8 percent (for the October-March period of FY1982) to 5.0 percent would yield savings in overissuances of nearly $500 million.[1] What needs to be determined is the extent to which categorical eligibility can contribute to such an error reduction. As mentioned above, this depends on how much caseworker time will be saved, if any, and how the caseworker will choose to spend such newly freed time.

Unfortunately, implementing categorical eligibility will probably have only this indirect effect on error reduction, since this change does little to address the sources of the major or most common errors in the Food Stamp Program directly. The results seen in the Simplified Application Demonstration sites provide evidence on this point. Error rate reductions in Illinois and Oklahoma were pronounced, but were insignificant in Fresno and San Diego Counties. The first two sites administered projects with far more radical changes. Discussing the results in Illinois, the demonstration evaluation reported:

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1. From tables prepared with GAO information, cited in U.S. Senate Committee on Agriculture, Nutrition, and Forestry, The Food Stamp Program: History, Description, Issues, and Options. Senate Print 99-32, April, 1985. pp. 280-281.

> In conclusion, it is clear that the demonstration substantially reduced error rates for AFDC/food stamp cases in Illinois. A large part of this reduction was due to the direct effects of the demonstration in terms of essentially 'defining away' certain types of errors. Whether the remaining error reduction is due to the demonstration or to other factors, such as the increased emphasis on other error-reduction measures, cannot be determined.[2]

The direct effects which "defined away" certain types of errors are not an inherent part of the current form of categorical eligibility. The Illinois and Oklahoma demonstration procedures allowed the use of standardized benefits and deductions for wide categories of household circumstances. By reducing the amount of information caseworkers were required to gather or verify, the project called fewer determinations into question. The project reduced the scope of what could be called errors. If income and deductions are assigned to a household, based on other attributes, most difficulties in determinations are eliminated. Households may have actually differed significantly from each other, but were treated, by categorical definitions, as if they were the same.

On the other hand, categorical eligibility as currently implemented in the FSP is of a more incremental nature, and, since each household's income and deductions still must be determined separately, it does not provide for definitional-type error reductions. Instead, the effects of categorical eligibility are more likely to be similar to those observed at the California county sites; that is, they will be indirect, if they exist at all. Unlike the new categorical eligibility provisions, the Simplified Application

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2. Simplified Application Demonstration Evaluation, op.cit., Vol. 2, pp. 78,81.

Demonstration policies at the California sites did affect gross income determinations by using the AFDC income definitions—resulting in greater potential impacts on benefits. Like the current form of categorical eligibility, however, the demonstration policies offered little direct effect through simplification or definitional changes, since true (not "assigned") income still had to be determined for FSP benefit calculations.

The one direct effect on error rates may be in the wrong direction. Categorical eligibility requires the worker to determine household purity. It should be noted that making this determination leaves room for increased error potential. The process of switching households between PA and NPA eligibility rules, as their circumstances warrant, may be a new source of error. The eligibility worker must be sure to use the correct program rules for benefit and eligibility determinations. It would be useful to learn to what extent this error potential exists. Again, much depends on the analysis of program administration effects.

Although further study of this point is needed, it seems likely that the relatively low error rate impacts seen in the two California sites under the Simplified Application Demonstration would also characterize the impacts of categorical eligibility, aside from those associated with PA and NPA determinations. As table 4.1 shows, most incorrect Food Stamp issuances are caused by participant rather than agency error. While additional time for verification may reduce some of these errors, many may be outside the control of the caseworker.

Table 4.1

Incorrect Issuances by Cause, in Percents

Source of Error	All Causes	Caused by Participant	Caused by Agency
Earned Income	36	28	8
Unearned Income	22	13	9
Household Size	16	12	4
Assets	9	8	1
Other	17	9	8
TOTAL	100	70	30

Source: GAO/RCED-83-40, 2/4/83, "Need for Greater Efforts to Recover Costs of Food Stamps Obtained through Errors or Fraud."

As table 4.1 also demonstrates, income errors are by far the greatest source of inaccurately issued Food Stamp Program benefits. According to a recent GAO study, over two-thirds of the dollars issued in error are due to faulty earned and unearned income determinations.[3] If a recipient chooses not to report employment or some unearned income, it is very difficult for the caseworker to determine the household's true income. This is especially true where caseloads are heavy, or the degree of automation is insufficient to permit the worker to match reported wages with Social Security records. GAO's report on this problem implies that some reduction in error rates may be an indirect result of categorical eligibility, if it frees some additional caseworker time for verifications. "Caseworkers...

3. U.S. GAO. "Better Wage-Matching Systems and Procedures Would Enhance Food Stamp Program Integrity." RCED-84-112, September 11, 1984. p. 1. The same is true of the AFDC program.

explained that because current eligibility determinations were their first priority, they could work only on wage matches of income reported for prior periods as time permitted."[4]

Other sources of error include determinations of deductions and household size, and errors in arithmetical computations. Categorical eligibility would not appear to affect any of these areas directly, although again indirect impacts could be felt as the result of administrative time savings. Under categorical eligibility, deductions and household size must be redetermined for each applicant, using FSP rules for PA and NPA households alike, which substantially limits any potential direct savings.

The other possibility held out by categorical eligibility is that, because more determinations will be made jointly across programs, caseworkers may find it easier to verify information for AFDC or SSI households. This might yield reduced error rates for this subset of Food Stamp Program participants. However, most of the increased ease seemingly offered by having multiple-program participants' records easily available was achieved before the implementation of categorical eligibility. As discussed in the last chapter, joint AFDC-FSP applications must currently be allowed, and single applications and reduced reporting burdens for SSI recipients who wished to apply for the Food Stamp Program were authorized under the Food Stamp Act of 1977. In most cases, categorical eligibility offers no more administrative or verification ease in this regard than the legislative or regulatory authority already in place.

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4. Ibid. p. 26.

In summary, categorical eligibility's impact on error rates is likely to be indirect at best. Given this expectation, and the knowledge that the provisions of categorical eligibility do not directly address any basic causes of errors, its effects on the error rate may be best understood, perhaps, by placing it in the larger context of program administration. The attempts to reduce errors, and their effectiveness, can be viewed as one component of the caseworker's administrative decisions. Insofar as application processing time is reduced, and caseworkers use the freed time to concentrate on error reduction, categorical eligibility may have a beneficial effect on the error rate. Categorical eligibility may affect those daily procedures, but is not expected to change any procedures in such a way as to reduce errors directly.

V. CONCLUSION: PROSPECTS FOR FURTHER RESEARCH

This report has summarized what is known about the effects of categorical eligibility for "pure" AFDC and SSI recipient households on the procedures used to determine eligibility for the Food Stamp Program. In addition, it has attempted to bring together as much information as possible on the characteristics and current operations of the three programs as they relate to eligibility determinations, in order to assess the potential impacts of this legislative change on FSP participation, administration, and error rates. The primary conclusions of this study are:

- While total participation in the FSP is very unlikely to be substantially increased as a result of the new categorical eligibility provisions, some specific types of households may gain FSP eligibility.
- There is some potential for administrative impacts in the FSP, but at this time it is not clear what the magnitude or even the direction of these effects would be.
- If any reduction in error rates occurs as the result of categorical eligibility, it will most likely be an indirect result of increases in the amount of caseworker time available for each case, rather than a direct result of the provisions themselves.

This chapter examines the implications of each of these conclusions for further research on the impacts of categorical eligibility. The following sections consider each major area—participation, administrative effects, and error rates—in turn.

Participation Effects of Categorical Eligibility

As noted above, existing data on the characteristics, assets, and incomes of AFDC and SSI recipients make it fairly clear that very few are

likely to gain eligibility for the FSP as the result of the recently passed categorical eligibility provisions. Among those in "pure" households, to whom the new provisions would apply, very few would be ineligible under current law. The comparison of eligibility rules across programs carried out in Chapter II identified three major groups that are exceptions to this general rule, and who would be affected by the new provisions. These groups are:

- AFDC and SSI recipients with income of a type counted by the FSP but not counted by their cash assistance program—for example, Pell Grant income.
- AFDC and SSI recipients in households containing two or more assistance units for the cash programs, and no one who was not in such an assistance unit.
- SSI recipients in one or two person households with net incomes just over the limit for FSP eligibility, who would qualify for the $10 minimum food stamp benefit.

None of these groups is expected to be large, and their impacts on total FSP benefit payments are also likely to be relatively small. In fact, many of those in the first two categories would technically gain eligibility for the FSP, without actually qualifying for any benefits. This may occur because although the new categorical eligibility provisions change eligibility determination rules for AFDC and SSI recipients, their benefits still must be calculated using FSP rules for determining total income and deductions. Thus, those with incomes too high to qualify for FSP eligibility under prior law are unlikely to qualify for a non-zero benefit under current law, even though they are technically eligible for the program. In the first case cited above, for example, even though an AFDC case with Pell Grant income must now be considered eligible for the

FSP, that income must still be counted in determining total FSP benefits, and in most cases counting this income will preclude the issuance of any benefits above the minimum.

Determination of benefits in cases of multiple AFDC or SSI assistance units within the same household is somewhat more complicated, and in some cases may result in positive benefits. For example, a household consisting of two AFDC units, each of which owns a car, might have failed the asset test for the FSP under prior law if it were in a state that had not implemented resource eligibility for AFDC recipients. Under current law, however, such a household would be eligible, and if both units had very low incomes it might qualify for positive benefits. Multiple assistance unit households that would have failed the income eligibility test for the FSP under prior law, however, would not be likely to qualify for any benefits under current law.

The third group discussed above, SSI recipients in small households living in high benefit States, would typically receive some benefits if they became eligible for the FSP under categorical eligibility. In most cases, however, they would receive only the $10 minimum benefit, which would limit the costs of this increase in eligibility.

As the above discussion indicates, although each of the groups likely to gain FSP eligibility as a result of these provisions is small, each presents certain problems relating to participation and benefit determination. For these reasons, it is proposed that this issue be examined in more detail in the remainder of this project. Specifically, we propose to model FSP eligibility under new law, and to use this model to determine how many cases, and of what types, would be eligible under new law but not under prior law. Those cases that would gain eligibility would

be divided into those who would become eligible without receiving any benefits, and those for whom a non-zero benefit would be available. The first group, while it may have no impacts on participation or benefits, may present complicated administrative problems, as discussed below, and therefore a count of its total size may be useful. A count of the second group, and an estimate of the total amount of benefits that they would receive, will be used to compute the maximum benefit costs that could be expected to result from this provision.

Data from the new Survey of Income and Program Participation (SIPP) will be used to construct the eligibility model. These data contain much more detailed information on the characteristics and numbers of multiple program participants (and potential participants) than is available from other sources, allowing detailed eligibility and benefit assessments to be made even for relatively small groups of potential FSP recipients. We expect that the eligibility model, once it has been constructed, will also be useful in assessing other FSP eligibility and participation issues. Details on the proposed construction of this model will be given in our forthcoming Design Report.

Administrative Effects of Categorical Eligibility

Although the potential administrative impacts of categorical eligibility were a major rationale for the passage of this legislation, program administration is the area in which it is most difficult to assess the probable effects of the legislation given current information. On the one hand, it is at least possible that some caseworker time (and some applicant aggravation) will be saved under the new procedures, if they do simplify eligibility determinations for some types of applicants. On the

other hand, only those who apply for AFDC and SSI benefits before (or simultaneously with) food stamps will actually be affected by any potential simplification. In addition, data from the Simplified Application Demonstrations appear to indicate that it is not eligibility determinations, but rather benefit determinations, that are the most time-consuming and error-prone part of the food stamp issuance process. Because the procedures implemented under this demonstration were not identical to those implemented under categorical eligibility, no direct extrapolation of impacts on potential administrative costs can be made, but it does not appear that the expected effects will be extremely large.

Further, it is possible that the new provisions will actually increase administrative costs in some cases. Probably the most important example of such possible increases has to do with the potential that some households will experience composition changes that will switch them back and forth between the PA and NPA caseloads, requiring repeated recertification for food stamp benefits.

As noted above, under the new provisions only "pure" AFDC and SSI households—those made up solely of AFDC and SSI recipients—are categorically eligible for the FSP. Although only a direct examination of Food Stamp Office procedures will determine exactly how much time is needed to determine that households in fact qualify under this provision, it seems possible that it may be almost as time-consuming as the normal FSP eligibility determination, particularly in complicated cases such as households containing multiple assistance units.

Changes in household composition or circumstances that result in repeated switching between the PA and NPA caseloads are potentially even more burdensome. For example, if a PA household gains a member who is not

receiving assistance, the household would have to be reclassified as an NPA case, and would then have to go through the normal eligibility determination procedures, possibly losing FSP eligibility. Such a redetermination would presumably be necessary even if the new member had no income. If the new household member stayed for only a few months, the household would have to be recertified again, this time as a PA case. Similar procedures would presumably be necessary for PA cases temporarily losing their eligibility for public assistance, perhaps for reasons such as failure to report income changes in a timely fashion, or for receiving lump-sum payments. If such switches are common, they could prove costly in terms of administrative time. Of course, in States that currently process PA and NPA cases separately, such redeterminations may already be done routinely when households change their assistance program status.

These issues clearly merit further study in the next phase of this project. We expect to propose a two-fold approach to considering changes in administrative costs resulting from categorical eligibility. The primary approach will involve discussions with staff in a small number of Food Stamp Offices, focusing on the following issues:

- What proportion of the FSP caseload in each office is in fact subject to eligibility determinations under the new provisions? Have these provisions caused any changes in normal procedures for determining eligiblity?
- Are PA and NPA cases processed separately or together? How common are changes between PA and NPA status, and how are such cases handled? Do they entail special administrative problems and costs?
- Are there administrative problems or advantages associated with the implementation of these new procedures that were not foreseen in this report?

In addition to discussions with local program eligibility workers, a second approach involving the examination of national-level data will be used to provide background information where possible. For example, our existing longitudinal SIPP files can be used to consider the frequency and types of composition changes experienced by PA households as a whole, and these results can be compared with the results for specific food stamp offices. Similar checks may be possible with regard to some of the other issues outlined above.

Categorical Eligibility and Error Rates

Although the language accompanying the categorical eligibility provisions in the Food Security Act of 1985 implies that some impacts on program error rates are to be expected, it appears unlikely from the available data that the direct effects of the legislation will be substantial in this regard. The findings of the Simplified Application Demonstration projects implied that in some cases error rates could be reduced, but in general these impacts were seen only in those demonstrations where determination of income and deductions, as well as eligibility determinations, were affected by the changes in program rules. Without such changes, the direct impacts on program error rates were negligible. It is even possible that error rates might be increased in some cases, if the new regulations actually increase administrative burdens for some food stamp offices.

In any case, it appears extremely likely that any impacts on error rates will be indirect, and will arise out of the administrative costs or savings resulting from these new provisions. On the one hand, if categorical eligibility does increase the amount of caseworker time

available for purposes other than eligibility determinations, and some of that time is spent in verification activities, then error rates may be reduced. On the other hand, if administrative burdens increase as the result of this provision, the impact on error rates is likely to be negative.

Because any error rate impacts that do occur are likely to arise directly from these administrative considerations, we recommend that any further study of error rate issues be folded into the administrative study outlined above. Specifically, if time savings resulting from categorical eligibility are identified, an additional set of questions on the disposition of that time could be added. Similarly, if administrative burdens are added, the results of these burdens in terms of time available for other purposes and the potential for new errors could be investigated. Because we do not believe, based on the available evidence, that there are likely to be any major error rate impacts other than those associated with these administrative issues, we do not believe that a separate error rate study would be fruitful at this time.

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